

Unsealed 06-28-10  
**SECRET**

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SOUTHERN DISTRICT OF CALIFORNIA

BY IV DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2010 Grand Jury

**10 CR 2153 JAH**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER ESPINOZA (1),  
JORGE SAMAME (2),

Defendants.

Case No.

I N D I C T M E N T

Title 21, U.S.C., Secs. 841(a)(1)  
and 846 - Conspiracy to Distribute  
Controlled Substances; Title 18,  
U.S.C., Sec. 1956(h) - Conspiracy  
to Launder Monetary Instruments

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to and including June 25, 2008, within the Southern District of California, and elsewhere, defendants CHRISTOPHER ESPINOZA and JORGE SAMAME did knowingly and intentionally conspire together and with each other and with other persons known and unknown to the grand jury to distribute controlled substances, to wit: Oxycontin, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

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Count 2

Beginning on a date unknown, and continuing up to and including June 25, 2008, within the Southern District of California and elsewhere defendants CHRISTOPHER ESPINOZA and JORGE SAMAME knowingly and intentionally conspired together and with other persons, known and unknown to:

1) conduct financial transactions, to wit: making cash deposits and withdrawals into various bank accounts of co-conspirators, which involved the proceeds of a specified unlawful activity, to wit, distribution of controlled substances in violation of Title 21, United States Code, Sections 841(a)(1) and 846, with the intent to promote the carrying on of the specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);

All in violation of Title 18, United States Code, Section 1956(h).

Count 3

Beginning June 25, 2008 and continuing up to and including June 1, 2010, within the Southern District of California, and elsewhere, defendant CHRISTOPHER ESPINOZA did knowingly and intentionally conspire with other persons known and unknown to the grand jury to distribute controlled substances, to wit: Oxycontin, a Schedule II Controlled Substances; in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

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Count 4

Beginning on June 25, 2008, and continuing up to and including June 2, 2010, within the Southern District of California and elsewhere defendant CHRISTOPHER ESPINOZA knowingly and intentionally conspired with other persons, known and unknown to:

1) conduct financial transactions, to wit: making cash deposits and withdrawals into bank accounts in financial institutions of co-conspirators, which transactions involved the proceeds of a specified unlawful activity, to wit, distribution of controlled substances in violation of Title 21, United States Code, Sections 841(a)(1) and 846, with the intent to conceal and disguise the nature, the source, the ownership and the control of the drug proceeds, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

All in violation of Title 18, United States Code, Section 1956(h).

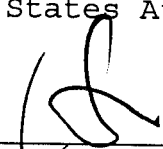
DATED: June 2, 2010.

A TRUE BILL:

  
Foreperson

LAURA E. DUFFY  
United States Attorney

By:

  
ORLANDO B. GUTIERREZ  
Assistant U.S. Attorney